

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re
DELPHI CORPORATION, et al.,
Debtors.

Chapter 11
Case No. 05-44481 (RDD)
(Jointly Administered)

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**OBJECTION OF L&W ENGINEERING CO., OMEGA TOOL CORP., RICHARD
JANES, TIP ENGINEERING GROUP, INC., PIONEER AUTOMOTIVE
TECHNOLOGIES, INC., ANDROID INDUSTRIES, LLC, AND AI-SHREVEPORT, LLC
TO THE DEBTORS' PROPOSED PROCEDURES GOVERNING HEARINGS
REGARDING DISALLOWANCE OR ESTIMATION OF CLAIMS**

L&W Engineering Co., Omega Tool Corp., Richard Janes, Tip Engineering Group, Inc.,
Android Industries, LLC, and Ai-Shreveport (collectively, the "Objecting Creditors")
respectfully submit their objection to the Debtors' Proposed Procedures Governing Hearings
Regarding Disallowance or Estimation of Claims (the "Claims Procedures Motion").

1. Each of objecting parties have filed proofs of claim in various of the Debtors'
respective bankruptcy cases.

2. The Debtors have filed objections to some or all of the claims of the Objecting
Creditors in the Debtors' second or third omnibus claims objections, and the Objecting Creditors
have or soon will file responses to the objections.

3. Numerous creditors, including Kilroy Realty, L.P. (Docket No. 5616) and Hitachi
Chemical (Singapore) PTE. LTD. (Docket No. 5664) have already objected to the Debtors'
Claim Procedures Motion.

4. In the interest of avoiding needless repetition, the Objecting Creditors reiterate the objections and statements of law already stated in the objections of Kilroy Realty, L.P. and Hitachi Chemical (Singapore) PTE. LTD.

5. The Objecting Creditors appreciate that the Debtors desire an efficient claims resolution process due to the numerous objections that the Debtors have filed, and are likely to continue to file, in this case. However, the claims resolution process proposed by the Debtors is efficient only for the Debtors, and impose an enormous and disproportionate burden on the creditors in terms of time and expense.¹

6. Further, the Debtors' proposed claims resolution process gives the Debtors considerable procedural advantages over the creditors which will likely unfairly tilt the outcome of many of these disputes in favor of the Debtors for reasons that have nothing to do with the merits of the claims.

Wherefore, for all the reasons stated above and in the previously filed objections of Kilroy Realty, L.P. and Hitachi Chemical (Singapore) PTE. LTD., the Objecting Parties request that this Honorable Court deny the Debtors' Claims Objection Motion and apply claims resolution procedures consistent with the Federal Rules of Bankruptcy Procedure with the purpose of protecting the rights and interests of the creditors as well as the Debtors.

Respectfully submitted,

SCHAFER AND WEINER, PLLC

By: /s/ Ryan Heilman

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¹ A more cynical reader of the Debtors' Claims Procedures Motion might suggest that the very purpose of the Debtors' overly cumbersome procedures is to persuade creditors to settle their claims on terms favorable to the Debtors.